

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

CURTIS WILLIAMS, a Washington resident,

Plaintiff,

v.

PHOENIX LAW, PC, a California corporation
law firm, and credit repair organization,

Defendant.

NO: 3:23-cv-05437

PLAINTIFF'S RESPONSE TO SHOW
CAUSE ORDER

COMES NOW the Plaintiff, by and through his attorney, Peter Schneider of Northwest Debt Resolution, LLC, and responds to the show cause order issued by this Court on 8-15-23 (ECF# 8).

RESPONSE

To date the Plaintiff has moved for an order of default, which was denied by this Court on 6-28-23 (ECF# 7). Defendant Phoenix Law, PC, was part of an ongoing fraudulent transfer of assets investigation in the Bankruptcy of Litigation Practice Group, PC (Bankruptcy Court of Central California #8:23-bk-10571). So too was it a party to an adversarial proceeding by the

PLAINTIFF'S RESPONSE TO SHOW CAUSE ORDER - 1

NORTHWEST DEBT RESOLUTION, LLC
10900 NE 4TH STREET, STE. 2300
BELLEVUE, WA 98004
TELEPHONE: (425) 400-9001
FACSIMILE: (425) 609-0066

1 trustee of that bankruptcy, Richard A. Marshack (see Marshack v. Diab et al #8:23-ap-01046).

2 During the last two months, Plaintiff's counsel had been monitoring these cases to
3 divine as to whether it was appropriate to take action in this case. Out of an abundance of
4 caution he did not.
5

6 However, it now appears that on 8-7-23 the assets of Litigation Practice Group,
7 including but not limited to the fraudulently transferred assets sold to Phoenix Law, PC, were
8 legally sold to a third party as a part of the sale of the bankruptcy estate (Bankruptcy Court of
9 Central California #8:23-bk-10571, ECF# 365).

10 The order appears to strip any liability incurred by Phoenix Law, resulting in the third
11 party receiving "clean" assets. The liability for its illegal conduct remains with Phoenix Law.
12

13 As a result, Plaintiff intends to perfect service on the Defendant in this matter pursuant
14 to the requirements of California law. Of note, the entity prescribed as the registered agent for
15 the Defendant was served with a copy of the summons and complaint in this matter. However,
16 the process server omitted the inclusion of the complaint. Plaintiff will explain to process
17 server that the name of the individual at the registered agent must also be recorded to comply
18 with Cal. Corp. Code § 1701.
19

20 To that end, Plaintiff requests this Court issue an order allowing service to be perfected
21 on the Defendant for an additional 60 days from the issuance of the order.

22 DATED August 26, 2023

23 NORTHWEST DEBT RESOLUTION, LLC

24 

25 Peter Schneider, WSBA# 43131
26 Attorney for Plaintiff